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Lester Snow - Exec. Director  
Cal Fed  
1416 9th St., Suite 1155  
Sacramento, CA. 95814

June 15, 1998

JUN 16 1998

Dear Mr. Snow,

I have reviewed the Cal Fed EIR/EIS and have the following comments.

1. How serious has Cal Fed looked at subsidizing changes in agricultural practices to reduce tillage related erosion? Aeolian erosion is a major component in Delta island "subsidence" and could be nearly eliminated through "NO TILL FARMING" - see the attached article. Please let me know of your position on this erosion/subsidence reducing measure.

(The following comments were previously submitted in May, 1998):

1. Water Conservation: I think that the Water conservation potential has not been fully considered. Especially the potential for agricultural land retirement on the west side of the San Joaquin Valley. This irrigated land is heavily subsidized already via the CVP and SWP and would be a good candidate for purchase/retirement by Cal Fed. I think that this "water" would come in cheaper than raising Shasta Dam. Adding storage to the system only adds "yield" occasionally, conservation adds water every year! Please let me know if this option has been thoroughly investigated and the conclusions reached.
2. Conjunctive Use / Groundwater Banking: I think that conjunctive use objectives could be increased. The tremendous aquifer storage in both the Sacramento and San Joaquin Valleys can be used to balance wet and dry year needs to a degree greater than shown. San Joaquin county alone has the potential of 200 taf/year in conjunctive use storage - according to EBMUD studies. With serious effort, I believe that higher conjunctive use goals could be achieved - probably at least double the amounts shown in the Alternative 2 and 3. Please let me know if this option has been thoroughly considered and conclusions reached.
3. Water quality: San Joaquin river water quantity and quality is a significant factor in the Delta. Toulumne, Merced, San Joaquin river (Friant) users as well as Stanislaus users should contribute to dilution/quality flows into the south Delta.
4. Isolated "peripheral" facility: If demand is reduced via conservation and local needs are partially met by conjunctive use/banking operations, and water quality is enhanced by San Joaquin river flows, Delta conveyance requirements are reduced. How sensitive are the conveyance alternatives to demand, quality and local groundwater storage variables? That is, if the above three items are in place, how close to meeting needs would the conveyance alternatives 1 or 2 be? Would the Isolated "Peripheral" facility still be needed?

Sincerely,  Tom Meagher, PO 2103, Sacramento, CA 95812

# What is No-Till Farming?

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With growing government regulation, more and more farmers who operate on highly erodible land are exploring the option of using no-till to comply with the newer programs set forth by the USDA and congress. These programs are useful in conserving the farmer's precious topsoil. You may wonder why no-till is such a reasonable alternative to conventional farming practices, and the answer is very simple. No-till farming is a process by which seeds are sown in an untouched, previously harvested field. Only the slightest sod is disturbed when the seeds are dispersed. This means no tillage of any kind is implemented throughout the duration of the growing season. Thus, the likelihood of severe erosion is drastically reduced. Seeds are planted in a compressed seedbed about one to three inches wide. Former crop residue and slight upstarts of grasses act as a natural mulch and help to protect the seedling and the surrounding soil from erosion while also trapping in vital moisture and protecting against evaporation. This natural mulch may also provide some nutrition for the seedling. The use of herbicides is the primary process of weed control in no-till farming.

This concept, though fairly new in agricultural production, is actually quite a seasoned concept. Whether you realize it or not, nature is a no-till farmer. Plants of various sizes and shapes have survived and reproduced for centuries without any help from man.

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# The Advantages of No-Till Farming

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There are two major advantages of no-till farming over conventional tillage farming. They are to improve soil and water conservation and to reduce costs while improving yields and profits.

Soil loss due to wind and water erosion is a very serious problem for farmers and for the environment. Conventional tillage leaves the soil bare and exposed to the wind and water. The principle of no-till farming is to keep crop residue or a cover crop on the soil all year round. This residue holds the soil in place and lets water soak into the ground. No-till can reduce soil loss by 90 percent thus cutting down on the amount of contaminants carried by the soil that go into streams, rivers, and lakes. Also with increased organic matter in no-till fields, the rate of pesticide degradation increases. Therefore, no-till is better for the environment.

The other major advantage is the reduction of costs in no-till farming. It saves costs in energy, time and labor, and machinery costs. It saves energy, time and labor by reducing the number of trips a farmer makes across a field. Conventional tillage requires several trips through a field with various tools. With no-tillage two trips are made. One while planting the field and the other when applying pesticides. This obviously cuts down on time and labor and saves energy with the reduction of diesel fuel consumption. It cuts down on machinery costs by eliminating the need for many of the tillage tools otherwise needed. No-till only requires a tractor, planter, grain drill, and spray rig.

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*Delta Erosion*

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